

UNSWORN DECLARATION
IN SUPPORT OF FORFEITURE COMPLAINT

INTRODUCTION

Pursuant to 28 U.S.C. § 1746, I, Dominique Paige, Special Agent, of the United States Department of Justice, Drug Enforcement Administration (DEA), declare under penalty of perjury that the foregoing is true and correct:

I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510 (7). I am, therefore, an officer who is empowered to conduct criminal investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.

I have been a Special Agent with the DEA for over four years. As a Special Agent, I have been sworn to enforce the laws of 21 U.S.C., and related offenses under 18 U.S.C. I have received sixteen weeks of training at the DEA Academy at Quantico, VA. I am currently assigned to the Ponce District Office (DO) HIDTA Task Force Group 3.

During my law enforcement career, I have received detailed instruction in and conducted various complex conspiratorial investigations concerning the unlawful importation and distribution of controlled substances; the laundering and concealment of drug proceeds; and the illegal use of communication facilities by drug traffickers in furtherance of their criminal activities.

PROPERTY TO BE FORFEITED

2008 Toyota Tacoma VIN: 5TEJU62N58Z523627

BASIS FOR FACTS CONTAINED IN THIS UNSWORN DECLARATION

I make this unsworn declaration, on information and belief derived from the following source:

A. Oral and/or written reports and documents about this and other federal agents or officers of DEA.

1. On June 28, 2023, members of the DEA Ponce DO – Hormigueros Office established surveillance in the parking lot of the Pueblo Supermarket, located in Carolina, Isla Verde, PR. On the same date, agents observed Rafael RODRIGUEZ-Martinez (driver) and passenger 1 (P1) arrive at said parking lot driving a red Toyota Tacoma. Subsequently, both, Rafael RODRIGUEZ-Martinez and P1 met with a DEA agent, acting in an undercover capacity (UC), to coordinate a drug smuggling venture from Venezuela (VZ) to Puerto Rico (PR). On the following day, DEA UCs traveled to said location that was discussed between RODRIGUEZ-Martinez and P1, but the drug venture was unsuccessful.
2. During the month of September 2024, Rafael RODRIGUEZ-Martinez contacted a DEA agent, acting in an undercover capacity (UC), to coordinate multiple drug smuggling ventures from the Dominican Republic (DR) to Puerto Rico (PR). Rafael RODRIGUEZ-Martinez and the DEA UC discussed coordinates, date and times and drug load amounts for said ventures.
3. On September 8th and 9th, 2024, DEA agents, acting in an undercover capacity (UC), conducted two separate UC operations that resulted in the seizure of approximately 332 kilograms of suspected cocaine. Subsequently,

DEA UC agents transported said drug loads to Puerto Rico (PR), processed it and secured it into DEA evidence as part of an ongoing investigation.

4. On September 9, 2024, Rafael RODRIGUEZ-Martinez from now on (RODRIGUEZ-Martinez) agreed to meet the DEA UC to receive said drug loads. On the same date, DEA agents staged at a predetermined location to conduct a controlled delivery operation involving RODRIGUEZ-Martinez and any other co-conspirators involved. Subsequently, DEA UCs identified the vehicle driven by RODRIGUEZ-Martinez after UCs established communication with RODRIGUEZ-Martinez, who verbally confirmed he (RODRIGUEZ-Martinez) was arriving to the location in a red pick-up truck. Upon arrival to the DEA UCs' location, agents identified the vehicle driven by RODRIGUEZ-Martinez as a red Toyota Tacoma. RODRIGUEZ-Martinez (driver) and P1 parked Toyota Tacoma near the UC vehicle. DEA UCs proceeded to show RODRIGUEZ-Martinez and P1 the bales containing the bales located inside the UC vehicle. Shortly after, DEA agents, wearing clear and visible police markings, arrested RODRIGUEZ-Martinez and P1.
5. A database check revealed that 2008 Red Toyota Tacoma is registered to Daniel MIRANDA-Garcia (PR License: 1203655).
6. On the same date an inventory was completed on the 2008 Toyota Tacoma, case agents recovered items inside the vehicle such as construction tools and various painting materials that were used by RODRIGUEZ-Martinez.
7. On September 10, 2024, a PRPB Agent, with her assigned canine (K-9), conducted a free air sniff of the exterior of the Toyota Tacoma and positively

alerted to the presence of narcotics towards the rear passenger door of the vehicle.

8. On September 18, 2024, at approximately 12:50 p.m., SA Noel Garcia and TFO Alexander Soto conducted a consensual interview of Daniel Garcia-Miranda regarding a 2008 Toyota Tacoma, LP: 847351, VIN: 5TEJU62N58Z523627. The interview was conducted at Garcia-Miranda's residence, which is located at Urb Los Maestro, 491 Calle Josefa Medina, San Juan PR 00915. Garcia-Miranda explained that on or about 2011, Triscila Vargas-Vazquez and Rafael RODRIGUEZ-Martinez asked him (Garcia-Miranda) for a loan of approximately \$6,000 United States Currency (USC) to buy the above-mentioned vehicle. Per Garcia-Miranda, Vargas-Vazquez put the vehicle under her name but then Vargas-Vazquez and RODRIGUEZ-Martinez began having marital issues and decided to transfer the vehicle to Garcia-Miranda's name until the debt (\$6,000 USC) was paid off. Garcia-Miranda stated that RODRIGUEZ-Martinez and Vargas-Vazquez eventually paid-off the debt for said vehicle. Per Garcia-Miranda, he looked for RODRIGUEZ-Martinez to transfer the vehicle to RODRIGUEZ-Martinez's name, but he (Garcia-Miranda) never found him. Garcia-Miranda also stated that RODRIGUEZ-Martinez always kept the vehicle in excellent condition. Garcia-Miranda told agents that RODRIGUEZ-Martinez works painting houses and other structures. Garcia-Miranda stated that he does not know if RODRIGUEZ-Martinez conducts illegal activities. Per Garcia-Miranda, he does not have RODRIGUEZ-Martinez's phone number. Garcia-Miranda

stated that he does not have any interest in said vehicle since the debt owed to him was paid off.

9. On January 13, 2025, Special Agents (SAs) Noel Garcia and Dominique Paige conducted a consensual interview via telephone of Triscila Carmen Vargas-Vazquez regarding a 2008 Toyota Tacoma, LP: 847351, VIN: 5TEJU62N58Z523627. According to Ms. Vargas-Vazquez she travels between Puerto Rico to the United States (Pennsylvania, PA) for the past 3-4 years. Ms. Vargas-Vazquez explained that when she is in Puerto Rico, she stays for 3-4 months at a time. Ms. Vargas-Vazquez stated that her uncle, Daniel Garcia Miranda, purchased the vehicle. Ms. Vargas-Vazquez explained she and Garcia-Miranda came to an agreement to pay off the balance of the vehicle in installments until the balance was paid in full. Ms. Vargas-Vazquez stated the title of the vehicle was placed in Garcia- Mirandas' name. In approximately 2017, Ms. Vargas-Vazquez stated that the vehicle was paid in full to her uncle.
10. Ms. Vargas-Vazquez stated the vehicle was purchased for her son (Jeampier RODRIGUEZ-Vargas), to travel to and from university. Ms. Vargas-Vazquez explained that she separated from Rafael Rodriguez-Martinez, whom is the father of Jeampier RODRIGUEZ-Vargas, in 2014. Ms. Vargas-Vazquez explained that all payments towards the vehicle were made solely by her (Vargas-Vazquez).
11. Throughout this investigation at no time did case agents observe Ms. Vargas-Vazquez or Jumpier RODRIGUEZ-Vargas operating the vehicle. At the

same time, on multiple occasions RODRIGUEZ-Martinez was observed utilizing the vehicle, until the date of his arrest (September 9, 2024). In addition, during the inventory of the vehicle, agents located multiple tools and items belonging to RODRIGUEZ-Martinez. No items belonging to Jeampier RODRIGUEZ-Vargas or Triscila Carmen Vargas-Vazquez were located inside of the vehicle. Furthermore, when personal property of RODRIGUEZ-Martinez was turned over to Jeampier RODRIGUEZ-Vargas, he (RODRIGUEZ-Vargas) provided his identification Learners permit Issued: May 25, 2023, Expiration: May 24, 2024), which displayed the identification being a learner's permit. Leading the affiants claim of the son's (Jeampier RODRIGUEZ-Vargas) utilization of the vehicle being limited.

This Unsworn Declaration is submitted in support of a complaint for forfeiture in rem, which involves the offenses detailed in 21 U.S.C. § 881(a)(4), which provides that all conveyances, including aircraft, vehicles, or vessels, which are used, or are intended for use, to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of vehicle described in paragraphs (1) (all controlled substances manufactured, distributed, dispensed or acquired in violation of Subchapter I of Chapter 13 of Title 21), (2) (all raw materials, products, and equipment of any kind which are used or intended for use in manufacturing, compounding, processing, delivering, importing, or exporting any controlled substance or listed chemical in violation of Subchapter I of Chapter 13 of Title 21), or (9) (all listed

chemicals, all drug manufacturing equipment, all drug manufacturing equipment, all tableting machines, all encapsulating machines, and all gelatin capsules, which have been imported, exported, manufactured, possessed, distributed, dispensed, acquired, or intended to be distributed, dispensed, acquired, imported, or exported, in violation of Subchapters I or II of Chapter 13 of Title 21 and 18 U.S.C. §§ 981(a)(1)(A) and (C)(Civil forfeitures). Therefore, I have not set forth each and every fact learned during the course of this investigation.

Based upon my training and experience, participation in other investigations, and facts concerning this investigation, I believe that sufficient probable cause exists to forfeit the 2008 Toyota Tacoma VIN: 5TEJU62N58Z523627, as property subject to forfeiture pursuant to 21 U.S.C. 881(a)(4).

Sworn and signed under penalty of perjury, pursuant to 28 U.S.C. § 1746, in San Juan, Puerto Rico this _____ of February 2025.

DOMINIQUE PAIGE Digitally signed by DOMINIQUE
PAIGE
Date: 2025.02.05 13:36:35 -04'00'

Dominique Paige, Special Agent
Drug Enforcement Administration (DEA)